



November 13, 2019

The Honorable Michael O’Rielly  
Commissioner  
Federal Communications Commission  
445 12<sup>th</sup> Street, SW  
Washington, DC 20554

Dear Commissioner O’Rielly:

On behalf of Valley Telephone Cooperative (“VTC”), I am writing to respond to statements and allegations made by Ms. Jacqui Clay, Cochise County School Superintendent, in her September 19, 2019 response to your August 26, 2019 request for information on the Cochise County Education and Technology Consortium (CCETC)’s 2019 request for Special Construction funding under the Universal Service Fund Schools and Libraries Program (the “E-Rate Program”). VTC’s response to certain statements made by Ms. Clay are in italics below.

Regardless of our difference in opinion on how E-Rate funds should be used to maximize the benefits of the program to all schools, VTC would first like to commend Ms. Clay in her efforts to deliver fiber optic facilities to schools and libraries in Cochise County. In those efforts we share a common goal. Well before Special Construction costs were eligible for funding under the E-Rate program, VTC constructed fiber optic cable to all of the schools and libraries in our ILEC exchanges and two CLEC exchanges. As a recipient of support from the High-Cost Program, VTC has received assistance in paying for these facilities in the ILEC exchanges. In the neighboring communities that are the CLEC exchanges, VTC has built fiber optic facilities to several schools and one library without any support from the high cost program. Earlier this year, VTC constructed fiber to one school and one library outside of our service area with special construction costs covered under the E-Rate program.

VTC has previously raised concerns with the Federal Communications Commission (“FCC”) regarding the potential waste in the 2019 CCETC E-Rate project, which if approved will result in millions of dollars of E-Rate funds being used to overbuild existing fiber networks to some of the smallest, most rural, expensive and difficult to serve schools in Cochise County. While Ms. Clay suggests otherwise in her response,<sup>1</sup> the information that VTC provided to you

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<sup>1</sup> Letter from Jacqui Clay, Cochise County School Superintendent, to Comm. Michael O’Rielly, FCC, WC Docket No. 13-184, CC Docket No. 02-6 (Sept. 19, 2019)(“Response letter”), 1.

and the FCC was accurate and complete.<sup>2</sup> Additionally, since its meetings with the FCC, VTC has met with Ms. Clay and other representatives of the CCETC. In that meeting, Ms. Clay informed VTC that the 2019 CCETC project has been significantly modified. If CCETC's Form 471 has been amended, VTC has been unable to locate the amended form online. However, even if amended, VTC's concerns regarding misuse and waste of the E-Rate funds remains, as explained in greater detail below.

- **The Project.** Ms. Clay's letter includes several paragraphs describing the project in for which CCETC sought funding. Ms. Clay claims that "[c]urrently, the schools and libraries in Cochise County are not receiving the bandwidth and service quality they need to adequately serve their students and patrons and most do not have access to service at the FCC recommended levels of bandwidth."<sup>3</sup> Ms. Clay continues, stating that "[i]f you add all of the bandwidth together that the County schools and libraries have access to today, it is less than 6 Gbps in total. The FCC-recommended goal for funding year 2020-next year-is nearly 78 Gbps total, given the number of students and patrons served."<sup>4</sup>

*As you are aware, the FCC bandwidth recommendations described in the E-Rate Modernization Order include a short term guideline of 100 Mbps per 1000 students and the long term guideline of 1GB per 1000 students. These are measured at a school district level or at a school level for schools that are not part of a district. They are not measured county wide as Ms. Clay states.*

*Exhibit 1 is the attachment from the CCETC RFP that showed the requested locations and the minimum and maximum bandwidths, by location for which bids were requested. The highlighted locations are the ones that VTC currently serves. The maximum requested bandwidths are nowhere near those that Ms. Clay avers are necessary. As shown, CCETC did not request these maximum bandwidth speeds in their RFP.*

*Exhibit 2 shows the bandwidths that the current entities served by VTC are buying versus the bandwidths requested in the RFP. With two exceptions, the speeds being purchased by the entities are very close or even over the maximum requested bandwidths in the RFP. Even in the case of the two schools that requested a higher maximum bandwidth, the existing fiber connection could meet the higher requested bandwidth. In no case would a new fiber cable be required to meet the maximum requested bandwidth of any of the CCETC schools that VTC currently serves.*

*Exhibit 3 shows the bandwidth the entities served by VTC are currently choosing to purchase versus the FCC recommended bandwidth for schools and libraries. Again, in most cases the amount of bandwidth currently being purchased well exceeds the FCC recommended bandwidth. For example, Ash Creek ESD currently has 500 Mbps for the 23 students it serves,*

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<sup>2</sup> VTC obtained the information through a Freedom of Information Act request to Cochise County and from the form 471 available through the USAC website.

<sup>3</sup> Response Letter at 2.

<sup>4</sup> Response Letter at 2.

*which is more than 21 times the FCC recommended long term goal. In the few cases where it does not, the speed could be increased with minimal effort. No fiber construction would be necessary.*

- **The Competitive Bidding Process.** In her letter, Ms. Clay criticizes VTC for not submitting a bid to the 2019 CCETC RFP and later (in response to Question 1) states that by choosing not to participate, VTC left CCETC with “no choice but to conclude that VTC was ‘unwilling or unable’” to meet their needs.<sup>5</sup> Ms. Clay further implies that VTC did not meet the obligation of a recipient of High-Cost Support to bid on projects in their ILEC exchanges.

*Most of the individual schools and libraries included in the CCETC RFP filed their own 471 forms outside of the consortium. Some of these entities issued an RFP for the 2019 funding year, some are under multiple year contracts and did not issue an RFP for 2019, and others chose to go month-to-month and not issue an RFP. In every case, where an RFP was issued in the VTC service area, VTC responded. All of the individual entities that are served by VTC have already received their 2019 funding decisions from USAC for the 471 forms they submitted outside of the CCETC. The same E-Rate consultant that the CCETC used to manage their proposed project and prepare the 471 forms also submitted many of the individual 471 forms, so Ms. Clay should be well aware that VTC participated. See Exhibit 4*

*In 2018, CCETC issued an RFP for a similar project. In the 2018 RFP, CCETC requested service to several schools and libraries. Many were locations already served by VTC with fiber. There were 9 locations to which VTC did previously serve with fiber and were outside of the VTC ILEC exchanges. VTC took the time to engineer the project and submit a bid for the schools to which it currently had fiber plus the 9 locations it did not. VTC's bid included \$1.9 million in Special Construction Costs to construct fiber to those 9 schools that it does not currently have fiber. VTC won the bid and was awarded the contract. CCETC submitted the 471 and several months later cancelled the project with no notice or explanation to VTC. A few months later, CCETC issued the RFP for a much larger project. Under the contract that was awarded to Zayo in 2019, the proposed construction cost to those same 9 locations is \$6.4 million. See Exhibit 5*

*Ms. Clay is correct that VTC did not submit a bid on the larger project. The RFP stated that it would allow multiple providers, but awarded 25 points for “completeness of network.” VTC was not in the position to build fiber all over the county and in urban areas. VTC attempted to partner with another provider to submit a bid but the partnership did not materialize. It seemed fairly obvious that CCETC had a larger provider in mind when it withdrew the funding request for the 2018 contract that had been awarded to VTC, with no explanation, and then issued a county-wide project including urban areas and several ineligible locations.*

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<sup>5</sup> Response Letter at 2-3.

- **Response to Questions. Question 1** of your request for information asked Ms. Clay to state how many school and library locations in Cochise County already have a fiber-based Internet connection. In her response, Ms. Clay asserted that she could not fully answer that question and that it may be better asked of the providers.

*For schools that receive E-Rate funding, there is publicly available information on the USAC website that shows the type of connection that schools currently have. The report is under "FRN Status Tool". Within that spreadsheet, there is a tab for FRN Line Item Detail and it shows what type of connection the schools have. This is based on information that the schools, or their E-Rate consultant submits to USAC. Exhibit 6 is a summary of that data for the CCETC entities. Not all of the CCETC Entities currently appear on the report, however between the entities that appear on that report and the two that are not on the report that VTC knows have fiber because we serve them, at least 30 of the 47 requested entities already have a fiber connection.*

- **Question 3** of your request for information asked Ms. Clay whether the backbone network used to provide service to ineligible county government locations will be the same backbone network used to provide service to the eligible locations. In response Ms. Clay simply states that any discussion of serving additional, E-rate ineligible locations is "theoretical."<sup>6</sup>

*As stated above, VTC recently met with Ms. Clay and other representatives of the CCETC. During that meeting, we learned that only 17 of the original 47 entities actually decided to join the CCETC (a fact missing from Ms. Clay's response to your letter). However, even though there are 30 less entities than originally anticipated, the amount of the funding request remains the same. CCETC has selected locations throughout the County to request service to so that essentially the same backbone network is required to serve 17 locations that would have been required to serve 47 locations. VTC serves 9 of the remaining locations. Four of the locations are schools and five are rural libraries. All locations currently have fiber.*

*The libraries, in particular, are an extreme example of the abuse of the E-Rate system in the CCETC funding request. These are five very small libraries. All five libraries currently have recently-installed fiber, all of them have service with the FCC recommended bandwidth of 100Mbps and they are each paying a monthly fee of only \$139.95, most of which already is subsidized from the E-Rate Program. When the CCETC issued their RFP, they requested a maximum bandwidth of 100Mbps to these libraries, the exact bandwidth that the libraries currently receive. VTC does not understand why CCETC is requesting millions of dollars in special construction funds to overbuild the existing fiber to these five rural libraries and why the federal E-Rate program should be paying for it.*

- **Question 4** of your request for information asked whether the RFP included a request to build fiber to the private residence of the Superintendent of the Cochise Technology District. In her response, Ms. Clay responded that once the review team noted the high cost of providing service to that location, they determined that the cost was not worth the

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<sup>6</sup> Response at 5.

benefit and immediately dropped the location from the project and that no funding was requested in the Form 471.

*The proposal from Zayo showed a non-recurring cost of \$29,858,515 of which \$2,227,693 was to the Cochise Tech JTED. Page 11 of the form 471 filed by CCETC on 2-28-19 shows a total one-time charge \$29,858,515, the same as the total on the Zayo proposal. If the private residence of the Cochise Technology District's Superintendent had been removed, the total one-time charge on the 471 should have been \$27,630,822 (the \$29,858,515 less the \$2,227,693 earmarked for the Superintendent's private residence). After discounting to calculate the E-Rate eligible portion, the funding request is on the 471 form is \$26,872,663. The 471 Review status pulled from the USAC website on 10/4/2019 shows the application pending and the amount requested being \$26,872,663. If the intent was to not serve that location, it is obvious that the cost of that location was not removed from the initial 471 filing as was stated in Ms. Clay's letter.*

*Further, the location is not detailed on the initial 471 filing, however on page 13, under the narrative section, it states that "there are a number of entities included that are not listed as members of the consortium yet, and need to be added." The list of locations to be added includes BEN 17018297. BEN 17018297 is listed on the RFP as the "Cochise Technology District location" which is the Cochise Technology District's Superintendent's private residence. See Exhibit 7.*

- **Questions 6 and 7** in your request for information asked Ms. Clay whether a cost analysis was done for providing fiber to schools that do not currently have fiber and what efficiencies were presented to justify combining all of the districts under one provider. You also asked for the CCETC to provide some documentation. Ms. Clay responded by quoting some history of some efficiencies that have been gained by other consortiums, but provided no specific information to the CCETC.

*CCETC did some cost analysis comparing the two bids that they received for their RFP. What appears to be missing is the cost analysis that shows whether forming the consortium even makes sense which I believe is what you were asking.*

*If so, Exhibit 8 is a calculation that shows the 10-year cost to serve the locations included in the CCETC proposal that are currently served by VTC. This is calculated using the rates currently being charged by VTC versus the CCETC proposal. Because of the construction costs, it will cost at least \$11.2 million more to serve these locations that are currently served by VTC over a ten-year period under the CCETC proposal than under the current arrangement through VTC. This is largely due to the construction costs. This is also calculated using the cost per location that was originally included in the Zayo proposal. Since the CCETC now includes only 17 locations versus the 47 that were originally included and the requested funding apparently remains the same, the cost per location included in the proposal are meaningless and actual costs per location will be dramatically higher. This would make the incremental cost of the consortium much higher than the \$11.2 million shown in Exhibit 8.*

*Please keep in mind that all but one of these schools are very small. There are approximately 1,400 students throughout all of the 4 schools served by VTC that remain part of the CCETC. Most of those students attend the largest school. In the remaining 3 schools, there are only 296 students. The libraries, as well, serve an extremely small population. The combined population of the communities that are served by the five library branches currently served by VTC is only 5,482. In fact, the population density of the entire Cochise County is only 21.3 persons per square mile. While there is clearly not a financial business case to construct fiber to these very small rural schools and libraries; subsidies through the Universal Service Fund have made it possible for these small schools and libraries to have fiber connections. To duplicate those fiber connections, however, would be an abuse of the Universal Service Fund.*

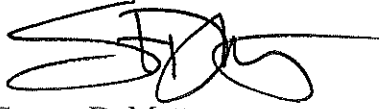
*I have personally spoken to each of the superintendents in the schools in the VTC service area. Not one of them expressed any concern about VTC meeting their current or future bandwidth needs, or the quality of the service they are getting. One superintendent expressed a legitimate concern over the price they are currently paying under their current contract being a little high versus what some providers charge for similar speeds. That can be addressed through a new contract, not millions in special construction funding. Some of the superintendents were not even aware that they were considered part of the CCETC. All but one of the locations that remain in the CCETC in the VTC service area use the same E-Rate consultant. That same consultant is representing CCETC.*

*CCETC is requesting \$26,872,663 in special construction funds and \$242,820 annually for recurring monthly charges. Over a 10-year contract the recurring charges would be \$2.4 million. When added to the construction cost of \$26.8 million the total is \$29.2 million over 10 years. That equates to \$243,000 per month. Even if all 47 locations joined the consortium, that is \$5,177 per location per month. That is exponentially more than those entities are currently paying. CCETC seemingly ignores the enormous costs associated with the special construction funding and only seems to compare what the schools and libraries are currently paying in monthly recurring costs versus what they would pay in monthly recurring costs under the new consortium plan. The reality is that the E-Rate program pays the majority of the monthly recurring charges **and** the special construction costs, so CCETC should be looking at both costs in determining what is most cost efficient.*

**Conclusion.** If the schools in Cochise county really need a WAN and a single provider, VTC is willing to help put one together and is willing to lease fiber to that provider for a fair price. It is clear that if only 17 of 47 actually joined the consortium, most schools and libraries in Cochise County do not see a benefit to this request. VTC fully supports Special Construction funds being used to build fiber to schools that don't currently have it. There are definitely schools in the CCETC funding request that need fiber and VTC fully supports funding being approved for those locations. Ms. Clay absolutely has the best interest of her students in mind and is attempting to do something for the good of the schools that she represents. VTC respects and admires her for that; however, there are far more efficient ways to get the desired result and the current CCETC proposal contains a huge waste of USF funds and should be adjusted so the duplication is eliminated and the truly unserved or underserved schools have access to the funds they desperately need. The FCC rules should be modified to protect against this type of abuse.

Commissioner O'Rielly, you have long been concerned with the potential waste that is caused by the overbuilding of networks that were already built with the assistance of USF dollars. Thank you for your concern and your diligent efforts to protect ratepayers from this type of abuse. Please do not hesitate to contact me if you have any questions.

Sincerely,

A handwritten signature in black ink, appearing to read 'S. Metts', with a long horizontal line extending to the right.

Steven D. Metts

CEO

Valley Telephone Cooperative

Cc: Donald L. Herman, Jr., Principal, Herman & Whiteaker, LLC  
Clare L. Andonov, Associate, Herman & Whiteaker, LLC  
Radha Sekar, CEO, USAC





**Educational Technology Consortium**  
Office of the County School Superintendent

L D P C	Entity	BEN/EN	Address	Lat	Long	Min	Max
						To Quote	To Quote
D	Apache ESD**	98101	10488 N. Skeleton Canyon Rd, San Simon, AZ 85632	31.690	-109.112	20	200
D	Ash Creek ESD	143094	6460 EAST HIGHWAY 181, PEARCE, AZ 85625	31.8768	-109.637	50	100
D	Benson USD	143062	360 S PATAGONIA BENSON, AZ 85602	31.96553	-110.298	200	6,000
D	Bisbee USD	143065	100 OLD DOUGLAS RD, BISBEE, AZ 85603	31.4282	-109.884	200	4,000
D	Bowie USD***	143069	315 W 5TH ST BOWIE, AZ 85605	32.32481	-109.490	50	200
D	Cochise SD****	143070	5025 NORTH BOWIE AVE, COCHISE, AZ 85606	32.11239	-109.921	50	300
D	Cochise Tech JTED	17018297	6506 E. Mills Maerker Rd, Wilcox, AZ 85643	32.14469	-109.639	50	100
D	Double Adobe School	98111	7081 N CENTRAL HWY, MC NEAL, AZ 85617	31.46747	-109.698	50	200
D	Douglas USD	143073	1132 E 12TH ST, DOUGLAS, AZ 85607	31.34652	-109.534	1,000	12,000
D	San Simon USD**	143100	I-10 BUSINESS LOOP, SAN SIMON, AZ 85632	32.32527	-109.481	50	500
D	St. David USD*	143097	70 PATTON HWY, SAINT DAVID, AZ 85630	31.90655	-110.220	100	2,000
D	Tombstone USD	143106	411 NORTH 9TH ST, TOMBSTONE, AZ 85638	31.71642	-110.059	200	4,000
D	Willcox USD	143110	480 N BISBEE AVE, WILCOX, AZ 85643	32.26252	-109.841	200	5,000
D	Fort Huachuca School District	143114	21110 HINES ROAD FORT HUACHUCA, COCHISE, AZ 85670	31.547	-110.369	100	5,000
D	McNeal Elementary School District***	143079	3979 McNeal St, McNeal, AZ 85617	31.599	-109.673	50	300
D	Naco Elementary School District	143082	1911 W VALENZUELA NACO, COCHISE, AZ 85620	31.337	-109.947	150	1,500
D	Palominas Elementary School District	143077	10385 E HIGHWAY 92 HEREFORD, COCHISE, AZ 85615	31.381	-110.125	700	4,000
D	Pearce Elementary School District	143093	1487 EAST SCHOOL ROAD PEARCE, COCHISE, AZ 85625	31.902	-109.824	50	500
L	Bisbee Branch	17008152	100 Clewson Ave, 2ND FL, BISBEE, AZ 85603	31.44295	-109.917	100	100
L	Elfrida Branch*****	229228	10552 N. HWY. 191, ELFRIDA, AZ 85610	31.750	-109.689	100	100
L	Jimmy Libhart Branch*****	98082	210 N. CENTRAL, BOWIE, AZ 85605	32.32715	-109.487	100	100
L	Portal Branch	98152	2393 S. Rock House Rd, PORTAL, AZ 85632	31.91415	-109.141	100	100
L	Sunizona Branch	98137	6460 EAST HIGHWAY 181, PEARCE, AZ 85625	31.8768	-109.637	100	100
L	Sunsites Branch	98138	210 N. FORD RD PEARCE, AZ 85625	31.940	-109.832	100	100
P	All Saints Catholic School	16072499	1425 E Yaqui St, Sierra Vista, AZ 85650	31.48278	-110.284	50	500
L	BENSON PUBLIC LIBRARY	143063	300 SOUTH HUACHUCA STREET, Benson, AZ 85602	31.96606	-110.297	50	100
C	Berean Academy - Sierra Vista **	17018811	1169 Colombo Ave, Sierra Vista, AZ 85635	31.567	-110.247	200	2,000
C	Center for Academic Success - District	98167	900 CARMELITA DRIVE SIERRA VISTA, COCHISE, AZ 85635	31.558	-110.290	300	5,000
L	Cochise County Library District	143066	100 Clewson Ave, 2ND FL, BISBEE, AZ 85603	31.44295	-109.917	n/a	n/a
L	Copper Queen Library	143068	6 Main Street, Bisbee, AZ 85603	31.44164	-109.917	50	100
L	DOUGLAS PUBLIC LIBRARY	16079219	560 EAST 10TH STREET, Douglas, AZ 85607	31.34449	-109.553	200	400
L	ELSIE S. HOGAN COMMUNITY LIBRARY	143111	100 NORTH CURTIS AVENUE, Willcox, AZ 85643	32.25332	-109.834	50	100
P	First Baptist Christian Academy	TBD	1447 S 7th St, Sierra Vista, AZ 85635	31.53906	-110.293	100	800
P	Grace Christian Academy	TBD	1050 S Post Road, Benson, AZ 85602	31.95071	-110.290	25	100
L	Huachuca City Public Library~~	143078	506 North Gonzales Blvd, Huachuca Dist, AZ 85616	31.63133	-110.335	20	200
P	Joanne Todd Christian School	TBD	321 W Maley St, Willcox, AZ 85643	32.25391	-109.835	50	200
C	Leman Academy - Sierra Vista	TBD	1000 E WILCOX DR SIERRA VISTA 85635	31.552	-110.288	50	100
C	Liberty Traditional Charter School-Douglas **	TBD	3715 N. Washington Ave., Douglas, AZ 85607	31.373	-109.528	50	100
P	Loretto Catholic School	98087	1200 E 14th St, Douglas, AZ 85607	31.34894	-109.558	50	1,000
C	Omega Alpha Academy - Douglas	221721	1402 SAN ANTONIO AVENUE DOUGLAS, COCHISE, AZ 85607	31.349	-109.532	100	1,200
D	Pomerene Elementary School District	143095	1396 N Old Pomerene Road POMERENE, COCHISE, AZ 85627	31.999	-110.286	100	400
C	PPEP TEC - Colin Powell - Sierra Vista	98177	4116 AVENIDA COCHISE, SUITES F-H SIERRA VISTA, COCHISE, AZ 85635	31.532	-110.256	50	400
C	PPEP TEC - Raul Castro - Douglas	98091	530 12TH STREET DOUGLAS, PIMA, AZ 85607	31.345	-109.545	50	700
L	SIERRA VISTA PUBLIC LIBRARY~	143103	2600 EAST TACOMA STREET, Sierra Vista, AZ 85635	31.56593	-110.272	200	1,000
D	Sierra Vista Unified School District	143104	3555 E FRY BLVD SIERRA VISTA, COCHISE, AZ 85635	31.555	-110.286	1,000	17,000
L	Tombstone Public Library	143105	210 South 4th Street, Tombstone, AZ 85638	31.71161	-110.067	20	100
D	Valley Union High School / Elfrida Elementary	143075	4088 JEFFERSON ROAD ELFRIDA, COCHISE, AZ 85610	31.686	-109.682	100	600
P	Veritas Christian Community School	TBD	215 Taylor Drive, Sierra Vista, AZ 85635	31.56138	-110.304	50	500
						<b>6,785</b>	<b>79,100</b>



**Valley Telecom Group****Exhibit 2****CCETC Entities Current Speeds Versus Requested Speeds in RFP**

<b>Entity Name</b>	<b>Current Speed</b>	<b>Min Speed Per RFP</b>	<b>Max Speed Per RFP</b>	<b>Difference</b>
Apache ESD	50	50	200	-150
Ash Creek ESD	500	50	100	400
Bowie USD	250	50	200	50
Cochise SD	500	50	300	200
Joanne Todd Christian School	20	50	200	-180
McNeal Elementary School District	250	50	300	-50
Pearce Elementary School District	500	50	500	0
San Simon USD	50	50	500	-450
Tombstone USD	200	200	4000	-3800
Valley Union High School	250	50	300	-50
Elfrida Elementary School *	250	50	300	-50
Willcox USD	200	200	5000	-4800
Elfrida Branch	100	100	100	0
Jimmy Libhart Branch	100	100	100	0
Portal Branch	100	100	100	0
Sunizona Branch	100	100	100	0
Sunsites Branch	100	100	100	0
Elsie S. Hogan Community Library	100	100	100	0
Tombstone Public Library	100	100	100	0

## Valley Telecom Group

## Current Service to Cochise County Schools and Libraries Versus FCC Speed Goals in E-Rate Modernization Order

Entity	Students	Current Speed MPBS	Current MBPS Per Student	FCC Short Term Goal MBPS (1)	FCC Long Term Goal MBPS (2)
Apache ESD	10	50	5.00	0.1	1
Ash Creek ESD	23	500	21.74	0.1	1
Bowie USD	52	250	4.81	0.1	1
Cochise SD	87	500	5.75	0.1	1
Joanne Todd Christian School	38	20	0.53	0.1	1
McNeal Elementary School District	57	250	4.39	0.1	1
Pearce Elementary School District	115	500	4.35	0.1	1
San Simon USD	116	50	0.43	0.1	1
Tombstone USD	988	200	0.20	0.1	1
Valley Union High School	65	250	3.85	0.1	1
Elfrida Elementary School *	66	250	3.79	0.1	1
Willcox USD	1111	200	0.18	0.1	1
Cochise Library District	Population (3)				
Elfrida Branch	459	100		100	100
Jimmy Libhart Branch	449	100		100	100
Portal Branch	1370	100		100	100
Sunizona Branch	1602	100		100	100
Sunsites Branch	1602	100		100	100
Elsie S. Hogan Community Library	3511	100		100	100
Tombstone Public Library	1380	100		100	100

(1) Per E-Rate Modernization Order FCC Short Term Goal for Internet Speed is 100 MBPS Per 1000 Students.  $100/1000 = .1$  Mbps Per Student

(2) Per E-Rate Modernization Order FCC Long Term Goal for Internet Speed is 1GB Per 1000 Students.  $1000/1000 = 1$  Mbps Per Student

(3) Per E-Rate Modernization Order FCC Goal for Libraries with Populations Less Than 50,000 is 100Mbps

471 Application	471 Review Status	FRN	FRN Status	BEN	Billed Entity Name	Type of 471 App	Applicant Stral SPIN	Service Provider Name	CRN	486 ServiceSt	Fund Year
191007240	FCDL Issued	1999008473	Funded	143106	TOMBSTONE UNIF SCHOOL DIST 1	School District	AZ	143029679	Valley Connections, LLC	16043643	7/1/19
191009706	FCDL Issued	1999011770	Funded	143105	TOMBSTONE CITY LIBRARY	Library	AZ	143029679	Valley Connections, LLC	16071819	2019
191015386	FCDL Issued	1999051874	Funded	143057	Thatcher Unified School District #4	School District	AZ	143029679	Valley Connections, LLC	16049151	2019
191012218	FCDL Issued	1999015728	Funded	143110	WILLCOX UNIFIED SCHOOL DISTRICT	School District	AZ	143029679	Valley Connections, LLC	16043643	2019
191012218	FCDL Issued	1999015731	Funded	143110	WILLCOX UNIFIED SCHOOL DISTRICT	School District	AZ	143029679	Valley Connections, LLC	16043643	2019
191023493	FCDL Issued	1999037071	Funded	143070	COCHISE SCHOOL DISTRICT 26	School District	AZ	143029679	Valley Connections, LLC	16024803	2019
191041059	FCDL Issued	1999075197	Funded	143039	DUNCAN UNIFIED SCHOOL DIST 2	School District	AZ	143029679	Valley Connections, LLC	16024803	2019
191031521	FCDL Issued	1999054107	Funded	143038	DUNCAN PUBLIC LIBRARY	Library	AZ	143001025	Valley Telecommunications Company, Inc.	16071819	2019
191010839	FCDL Issued	1999013342	Funded	143094	ASH CREEK ELEM SCH DISTRICT 53	School District	AZ	143002472	Valley Telephone Cooperative, Inc.	16071819	2019
191037537	FCDL Issued	1999068018	Funded	98189	BONITA ELEMENTARY SCHOOL	School	AZ	143002472	Valley Telephone Cooperative, Inc.	16071819	2019
191018603	FCDL Issued	1999027528	Funded	143066	COCHISE COUNTY LIBRARY DIST	Library System	AZ	143002472	Valley Telephone Cooperative, Inc.	16071819	2019
191012367	FCDL Issued	1999016006	Funded	143069	BOWIE UNIF SCHOOL DISTRICT 14	School District	AZ	143002472	Valley Telephone Cooperative, Inc.	16071819	2019
191014507	FCDL Issued	1999019301	Funded	143100	SAN SIMON UNIF SCHOOL DIST 18	School District	AZ	143002472	Valley Telephone Cooperative, Inc.	16043643;16	2019
191010855	FCDL Issued	1999013371	Funded	98101	APACHE ELEMENTARY SCHOOL	School	AZ	143002472	Valley Telephone Cooperative, Inc.	16071819	2019
191039261	FCDL Issued	1999071615	Denied	143079	MCNEAL ELEM SCHOOL DISTRICT 55	School District	AZ	143002723	Copper Valley Telephone, Inc.	16071819	2019
191010870	FCDL Issued	1999013404	Funded	143075	VALLEY UNION HIGH SCH DIST 22	School District	AZ	143002723	Copper Valley Telephone, Inc.	16071819	2019
191012368	FCDL Issued	1999016009	Funded	143074	ELFRIDA SCHOOL DISTRICT 12	School District	AZ	143002723	Copper Valley Telephone, Inc.	16071819	2019
191018603	FCDL Issued	1999027517	Funded	143066	COCHISE COUNTY LIBRARY DIST	Library System	AZ	143002723	Copper Valley Telephone, Inc.	16071819	2019

**Valley Telephone Cooperative, Inc****Exhibit 5****Comparison of VTC 2018 Bid to Zayo 2019 Bid to Provide Fiber to Certain Schools**

<b>Entity</b>	<b>BEN/EN</b>	<b>Current Provider</b>	<b>Current Technology</b>	<b>Valley Bid 2018</b>	<b>Zayo Bid 2019</b>	
Benson USD	143062	Transworld	Wireless	\$278,600	\$510,305	
Bisbee USD	143065	GovNet	Microwave	443,000	398,496	
Bisbee Library	17008152	Transworld	Wireless	94,100	312,490	
Cochise SD	143070	Valley	Fiber	153,300	1,001,975	(1)
Cochise Tech JTED	17018297	Unknown	Unknown	274,000	2,277,693	(2)
Double Adobe School	98111	GovNet	Microwave	182,500	518,905	
Douglas USD	143073	Cox	Fiber	65,000	672,283	
St. David USD*	143097	Cox	Cable Modem	436,500	473,035	
Tombstone USD	143106	Valley	Fiber	9,500	249,419	(3)
<b>Totals</b>				<b>\$1,936,500</b>	<b>\$6,414,601</b>	

(1) - In 2018, Valley was providing service to Cochise School with wireless technology. In 2019, Cochise School obtained E-Rate special construction funds outside of the Consortium and Valley constructed fiber to the location. Cochise School is still included in the current funding request.

(2) Cochise Tech JTED is a consortium of several school districts. Since bidding in 2018, Valley has learned that this location is the private residence of the Superintendent of this district. It is used as the business address for the district but there are no student facilities at the location. Upon retirement or resignation of the superintendent, this would be a residential service.

(3) - In 2018, Tombstone was receiving service from Transworld with wireless technology. In 2019, Valley constructed fiber to Tombstone without assistance from E-Rate construction funds. Tombstone is still included in the current funding Request.



Application Number	BEN	Billed Entity Name	Contact Email	FRN	Line Item	Function	Type of Product	Purpose	Upload Speed	Upload S	Download S	Sp Download
191018223	98091	PREP TEC - Raul Castro	lorprincipal@lorettoschool.org	Not on 471 Report	1999026576	Fiber	OC-1	Internet acce	51,480 Mbps	51,480 Mbps	51,480 Mbps	51,480 Mbps
191018555	98101	APACHE CATHOLIC SCHOOL	frank.vander.horst@yavapai.us	1999013371	1999013371	Fiber	Ethernet	Internet acces	50,000 Mbps	50,000 Mbps	50,000 Mbps	50,000 Mbps
191009309	98111	DOUBLE ADOBE SCHOOL	frank.vander.horst@yavapai.us	1999011209	1999011209	Wireless	Microwave	Internet acces	20,000 Mbps	20,000 Mbps	20,000 Mbps	20,000 Mbps
191026708	98167	Center for Academic Success	amigue@erateportal.com	1999044340	1999044340	Fiber	Ethernet	Internet acce	1000,000 Mbps	1000,000 Mbps	1000,000 Mbps	1000,000 Mbps
191026708	98177	PREP TEC - Colin Powell		Not on 471 Report								
191021115	143062	BENSON UNIFIED SCHOOL DISTRICT	cayres@bensonsd.k12.az.us	1999032585	1999032585	Wireless	Microwave	Internet acce	200,000 Mbps	200,000 Mbps	200,000 Mbps	200,000 Mbps
191020778	143063	BENSON PUBLIC LIBRARY	erate@busd.k12.az.us	Not on 471 Report								
191018603	143065	BISBEE UNIFIED SCHOOL DIST 2	frank.vander.horst@yavapai.us	1999047485	1999047485	Fiber	Ethernet	Internet acce	600,000 Mbps	600,000 Mbps	600,000 Mbps	600,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - BISBEE BRANCH	frank.vander.horst@yavapai.us	1999027472	1999027472	Fiber	Ethernet	Internet acce	100,000 Mbps	100,000 Mbps	100,000 Mbps	100,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - ELFRIDA BRANCH	frank.vander.horst@yavapai.us	1999027517	1999027517	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	15,000 Mbps	15,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - JIMMY LIBHART BRANCH	frank.vander.horst@yavapai.us	1999027518	1999027517	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	15,000 Mbps	15,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - PORTAL BRANCH	frank.vander.horst@yavapai.us	1999027519	1999027517	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	15,000 Mbps	15,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - SUNIZONA BRANCH	frank.vander.horst@yavapai.us	1999027528	1999027528	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	15,000 Mbps	15,000 Mbps
191018603	143066	COCHISE COUNTY LIBRARY DIST - SUNSITES BRANCH	frank.vander.horst@yavapai.us	1999027529	1999027528	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	15,000 Mbps	15,000 Mbps
191012367	143068	COPPER QUEEN LIBRARY		Not on 471 Report								
191012367	143069	BOWIE UNIF SCHOOL DISTRICT 14	frank.vander.horst@yavapai.us	1999016006	1999016006	Fiber	Ethernet	Internet acce	20,000 Mbps	20,000 Mbps	200,000 Mbps	200,000 Mbps
191023493	143070	COCHISE SCHOOL DISTRICT 26	clenhardt@erateilite.com	1999037071	1999037071	Fiber	Ethernet	Internet acce	25,000 Mbps	25,000 Mbps	500,000 Mbps	500,000 Mbps
191003483	143073	DOUGLAS UNIFIED SCHOOL DIST 27	erate@douglaschools.org	1999003617	1999003617	Fiber	Ethernet	Internet acce	3,000 Gbps	3,000 Gbps	3,000 Gbps	3,000 Gbps
191012368	143074	ELFRIDA SCHOOL DISTRICT 12	frank.vander.horst@yavapai.us	1999016009	1999016009	Fiber	Ethernet	Internet acce	20,000 Mbps	20,000 Mbps	250,000 Mbps	250,000 Mbps
191010870	143075	VALLEY UNION HIGH SCH DIST 22	frank.vander.horst@yavapai.us	1999013404	1999013404	Fiber	Ethernet	Internet acce	20,000 Mbps	20,000 Mbps	250,000 Mbps	250,000 Mbps
191010870	143077	PALOMINAS SCHOOL DISTRICT 49	erate@palominas.k12.az.us	1999003735	1999003735	Fiber	Ethernet	Internet acce	700,000 Mbps	700,000 Mbps	700,000 Mbps	700,000 Mbps
191003550	143078	HUACHUCA CITY PUBLIC LIBRARY	frank.vander.horst@yavapai.us	Internet Not Listed on 471								
191039261	143079	MNEAL ELEM SCHOOL DISTRICT 55	mnealelem@vtc.net	1999071615	1999071615	Fiber	Switched Mt	Internet acce	20,000 Mbps	20,000 Mbps	250,000 Mbps	250,000 Mbps
191010839	143093	PEARCE ELEMENTARY SCHOOL		1999013342	1999013342	Fiber	Ethernet	Internet acce	50,000 Mbps	50,000 Mbps	500,000 Mbps	500,000 Mbps
191010839	143094	ASH CREEK ELEM SCH DISTRICT 53	frank.vander.horst@yavapai.us	1999013342	1999013342	Fiber	Ethernet	Internet acce	50,000 Mbps	50,000 Mbps	500,000 Mbps	500,000 Mbps
191037038	143095	POWERNE ELEMENTARY SCHOOL DISTRICT		Not on 471 Report								
191037038	143097	ST DAVID UNIFIED SCH DIST 21	acwagner@stdavid.org	1999066788	1999066788	Copper	Cable Modem	Internet acce	20,000 Mbps	20,000 Mbps	200,000 Mbps	200,000 Mbps
191014507	143100	SAN SIMON UNIF SCHOOL DIST 18	frank.vander.horst@yavapai.us	1999019301	1999019301	Fiber	Ethernet	Internet acce	10,000 Mbps	10,000 Mbps	50,000 Mbps	50,000 Mbps
191014728	143104	SIERRA VISTA UNIF SCH DIST 68	erate@sygs.k12.az.us	1999019680	1999019680	Fiber	Ethernet	Internet acce	3,000 Gbps	3,000 Gbps	3,000 Gbps	3,000 Gbps
191009706	143105	TOMBSTONE CITY LIBRARY	frank.vander.horst@yavapai.us	1999011770	1999011770	Fiber	Ethernet	Internet acce	15,000 Mbps	15,000 Mbps	100,000 Mbps	100,000 Mbps
191007240	143106	TOMBSTONE UNIF SCHOOL DIST 1	erate@tombstone.k12.az.us	1999008466	1999008466	Fiber	Ethernet	Internet acce	1,000 Gbps	1,000 Gbps	1,000 Gbps	1,000 Gbps
191007240	143106	TOMBSTONE UNIF SCHOOL DIST 1	erate@tombstone.k12.az.us	1999008473	1999008473	Fiber	Ethernet	Internet acce	200,000 Mbps	200,000 Mbps	200,000 Mbps	200,000 Mbps
191012218	143110	WILCOX UNIFIED SCHOOL DISTRICT	erate@wmsd13.org	1999015728	1999015728	Fiber	Ethernet	Internet acce	200,000 Mbps	200,000 Mbps	200,000 Mbps	200,000 Mbps
191012218	143111	ELSIE HOGAN PUBLIC LIBRARY		1999015728	1999015728	Fiber	Ethernet	Internet acce	200,000 Mbps	200,000 Mbps	200,000 Mbps	200,000 Mbps
191041758	143114	FORT HUACHUCA COMM SCHOOLS	frank.a.bell@fhssd.org	1999076587	1999076587	Fiber	OC-12	Internet acce	622,080 Mbps	622,080 Mbps	622,080 Mbps	622,080 Mbps
191020972	221721	Omega Alpha Academy	uscdf@gmail.com	1999032580	1999032580	Fiber	Ethernet	Internet acce	100,000 Mbps	100,000 Mbps	100,000 Mbps	100,000 Mbps
191001062	16072499	All Saints Catholic School	clarissa.cota@douglasaz.gov	1999000916	1999000916	Fiber	Ethernet	Internet acce	200,000 Mbps	200,000 Mbps	200,000 Mbps	200,000 Mbps
191001062	16079219	DOUGLAS PUBLIC LIBRARY		Not on 471 Report								
191018297	17018297	Cochise Tech JTED		1999000916	1999000916	Fiber	Ethernet	Internet acce	20,000 Mbps	20,000 Mbps	20,000 Mbps	20,000 Mbps
191018811	17018811	BEREN ACADEMY- COCHISE COMMUNITY DEVELOPMENT CORP	frank.vander.horst@yavapai.us	1999034361	1999034361	Copper	Ethernet	Internet acce	100,000 Mbps	100,000 Mbps	100,000 Mbps	100,000 Mbps
TBD	TBD	First Baptist Christian Academy		Not on 471 Report								
TBD	TBD	Leman Academy - Sierra Vista		Not on 471 Report								
TBD	TBD	Liberty Traditional Charter School		Not on 471 Report								
TBD	TBD	Grace Christian Academy		Not on 471 Report								
TBD	TBD	Joanne Todd Christian School		Not on 471 Report		Fiber						
TBD	TBD	Veritas Christian Community School		Not on 471 Report								
				Fiber								
				30								
				Non Fiber								
				4								
				Unknown								
				13								



Craig Pool  
Zayo Group: Channel Manager  
Phone: 801.214.7024  
ccampbell@onetelgem.com



## 10G Port Access - 10 Year Option

### Zayo - Private Dedicated Network

If you need the security, scalability and dependability of a private network, but don't want the burden of owning and operating your own network infrastructure, then Zayo's private dedicated network services might suit your business. Get connectivity on dedicated fiber and dedicated equipment that allows you to securely connect high-bandwidth facilities within a metro or between cities.

As a trusted network provider, Zayo has designed, installed and managed hundreds of the most complex Dedicated Solutions for the most demanding customers in the industry, including financial institutions, healthcare providers, government entities, school districts and content companies. Our flexible solutions solve for specific configurations and routing as well as latency and diversity requirements.

#### Customer Details

Cochise County Educational Technology Consortium  
Contact Name  
Street Address  
City, State, Zip Code  
Phone Number

#### Solution Details

- Customer can make annual NRC payments across 4 years
- Completely owned and operated Tier 1 fiber Network
- Private network design, extremely low latency
- Limitless bandwidth
- 24/7/365 monitored for repair
- Backed by one of the nation's largest IP/Lit/Dark Fiber providers
- Each location's equipment scalable to 40G out of the box

Customer	Cochise County Educational Technology Consortium	Allowable Contract Date	10/13/2018
E-Rate Discount	82%	Zayo SPIN	143023855
Pricing Schedule			

Internet and Lit Fiber Taxes and Fees estimated at 6.08%

### Fiber Port - 10 Year Term for all K-12 Locations

1,584,006.101 Feet of Fiber Construction - ~\$18.85 CPF

Location	Port Bandwidth	Term	Monthly Recurring	Non-Recurring	Post E-Rate MRC	Post E-Rate
Apache ESD	10G x 10G	120 Months	\$395.00	\$1,328,799.02	\$71.10	\$239,183.82
Ash Creek ESD	10G x 10G	120 Months	\$395.00	\$970,438.98	\$71.10	\$174,679.02
Sunizona Branch	10G x 10G	120 Months	\$395.00	\$958,971.46	\$71.10	\$172,614.86
Benson USD	10G x 10G	120 Months	\$395.00	\$510,304.69	\$71.10	\$91,854.85
Bisbee USD	10G x 10G	120 Months	\$395.00	\$398,496.36	\$71.10	\$71,729.35
Bowie USD***	10G x 10G	120 Months	\$395.00	\$1,374,669.11	\$71.10	\$247,440.44
Center for Academic Success - District	10G x 10G	120 Months	\$395.00	\$55,904.17	\$71.10	\$10,062.75
Cochise County Library District	10G x 10G	120 Months	\$395.00	\$312,489.95	\$71.10	\$56,248.19
Cochise SD****	10G x 10G	120 Months	\$395.00	\$1,001,974.67	\$71.10	\$180,355.44
Double Adobe School	10G x 10G	120 Months	\$395.00	\$518,905.34	\$71.10	\$93,402.96
Douglas USD	10G x 10G	120 Months	\$395.00	\$672,283.43	\$71.10	\$121,011.02
Fort Huachuca School District	10G x 10G	120 Months	\$395.00	\$124,709.29	\$71.10	\$22,447.67
Huachuca City Public Library***	10G x 10G	120 Months	\$395.00	\$151,944.66	\$71.10	\$27,350.04
Loretto Catholic School	10G x 10G	120 Months	\$395.00	\$670,849.99	\$71.10	\$120,753.00
McNeal Elementary School District***	10G x 10G	120 Months	\$395.00	\$642,181.19	\$71.10	\$115,592.61
Omega Alpha Academy - Douglas	10G x 10G	120 Months	\$395.00	\$685,184.39	\$71.10	\$123,333.19
Pearce Elementary School District	10G x 10G	120 Months	\$395.00	\$1,027,776.59	\$71.10	\$184,999.79
San Simon USD**	10G x 10G	120 Months	\$395.00	\$1,605,452.97	\$71.10	\$288,981.54
St. David USD*	10G x 10G	120 Months	\$395.00	\$473,035.25	\$71.10	\$85,146.35
Tombstone USD	10G x 10G	120 Months	\$395.00	\$249,418.59	\$71.10	\$44,895.35
Valley Union High School***	10G x 10G	120 Months	\$395.00	\$710,986.32	\$71.10	\$127,977.54
Willcox USD	10G x 10G	120 Months	\$395.00	\$1,043,544.43	\$71.10	\$187,838.00
First Baptist Christian Academy	10G x 10G	120 Months	\$395.00	\$65,938.25	\$71.10	\$11,868.88
Joanne Todd Christian School	10G x 10G	120 Months	\$395.00	\$1,037,810.67	\$71.10	\$186,805.92
Veritas Christian Community School	10G x 10G	120 Months	\$395.00	\$67,371.69	\$71.10	\$12,126.90
Sunsites Branch	10G x 10G	120 Months	\$395.00	\$1,016,309.07	\$71.10	\$182,935.63
Naco Elementary School District	10G x 10G	120 Months	\$395.00	\$447,233.33	\$71.10	\$80,502.00
Pomerene Elementary School District	10G x 10G	120 Months	\$395.00	\$592,010.78	\$71.10	\$106,561.94
Palominas Elementary School District	10G x 10G	120 Months	\$395.00	\$219,316.34	\$71.10	\$39,476.94
Grace Christian Academy	10G x 10G	120 Months	\$395.00	\$547,574.14	\$71.10	\$98,563.34
Sierra Vista Unified School District	10G x 10G	120 Months	\$395.00	\$27,235.36	\$71.10	\$4,902.37
Berean Academy - Sierra Vista **	10G x 10G	120 Months	\$395.00	\$28,668.80	\$71.10	\$5,160.38
Leman Academy - Sierra Vista	10G x 10G	120 Months	\$395.00	\$51,603.85	\$71.10	\$9,288.69
Liberty Traditional Charter School-Douglas **	10G x 10G	120 Months	\$395.00	\$692,351.59	\$71.10	\$124,623.29
PPEP TEC - Colin Powell - Sierra Vista	10G x 10G	120 Months	\$395.00	\$44,436.64	\$71.10	\$7,998.60
PPEP TEC - Raul Castro - Douglas	10G x 10G	120 Months	\$395.00	\$663,682.79	\$71.10	\$119,462.90
All Saints Catholic School	10G x 10G	120 Months	\$395.00	\$117,542.09	\$71.10	\$21,157.58
Jimmy Libhart Branch*****	10G x 10G	120 Months	\$395.00	\$1,377,535.99	\$71.10	\$247,956.48
Portal Branch	10G x 10G	120 Months	\$395.00	\$1,519,446.56	\$71.10	\$273,500.38
Elfrida Branch*****	10G x 10G	120 Months	\$395.00	\$718,153.52	\$71.10	\$129,267.63
BENSON PUBLIC LIBRARY	10G x 10G	120 Months	\$395.00	\$528,939.42	\$71.10	\$95,209.10
Copper Queen Library	10G x 10G	120 Months	\$395.00	\$318,223.71	\$71.10	\$57,280.27
DOUGLAS PUBLIC LIBRARY	10G x 10G	120 Months	\$395.00	\$680,884.07	\$71.10	\$122,559.13
ELSIE S. HOGAN COMMUNITY LIBRARY	10G x 10G	120 Months	\$395.00	\$1,037,810.67	\$71.10	\$186,805.92
SIERRA VISTA PUBLIC LIBRARY**	10G x 10G	120 Months	\$395.00	\$53,037.29	\$71.10	\$9,546.71
Cochise Tech JTED	10G x 10G	120 Months	\$395.00	\$2,277,693.00	\$71.10	\$409,584.74
Tombstone Public Library	10G x 10G	120 Months	\$395.00	\$239,384.51	\$71.10	\$43,089.21

Total \$18,565.00 \$29,858,515.00 \$3,341.70 \$5,374,532.70

\*Port cost for 1G and 10G are the same. Customer can add additional 10G ports at school sites for an additional \$75 MRC per 10G. For example - 4x10G ports would be \$620 MRC

**FRN Calculation for FRN #1999023685**

One-Time Charges	
Total One-Time Charges	\$29,858,515.00
Total Ineligible One-Time Charges	- \$0.00
Total Eligible Pre-Discount One-Time Charges	= \$29,858,515.00

Total Requested Amount	
Total Pre-Discount Charges	\$29,858,515.00
Special Construction State/Tribal Match Percentage	10%
Special Construction State/Tribal Match Discount Rate*	90%
Funding Commitment Request	= \$26,872,663.50

Signed CCETC Proposal and Acceptance offer.pdf	
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### Pricing Confidentiality

Is there a statute, rule, or other restriction which prohibits publication of the specific pricing information for this contract? No

#### Narrative

Rural county wide fiber project going to 47 E-rate eligible entities. There are a number of entities included that are not listed as members of the consortium yet, and need to be added. They are BENs 98177, 98091, 221721, 17018811, 98167, 17018297, 143079, 143095, 143093, 143075, 143082, 143077, 143114, 143104, 143063, 143068, 143111, 143078, 143105, 143103, 16079219, 16072499, and 98087. There are also six entities that need to be added that have BENs that are TBD - Leman Academy - Sierra Vista, Liberty Traditional CS - Douglas, Grace Christian Academy, Joanne Todd Christian School, Veritas Christian Community School, and First Baptist Christian Academy.



Exhibit 7  
4 of 4

471 Application 471 Review Status	FRN	FRN Status	BEN	Billed Entity Name	Type of 471 Application	Applicant Stat SPIN	Service Provider Name	CIN	485 Service Fund Year	Wave N	PC Wave Num	Original Requested	Committed Amoi	Total Disbursement Amount
191001248 FCDL Issued	1999004886	Funded	16074858	Paragonia School District Consortium	Consortium	AZ	143033848	GovNet Inc.	16049151	7/1/19	2019	1	\$30,600.00	\$30,600.00
191003775 FCDL Issued	1999007542	Funded	143937	PINAL COUNTY LIBRARY DISTRICT	Consortium	AZ	143005231	CenturyLink Qwest Corporation	16071819	7/1/19	2019	10	\$13,191.97	\$13,191.97
191007881 FCDL Issued	1999009335	Funded	17010879	Yavapai County Library Network	Consortium	AZ	143001157	CenturyLink Qwest Communica	16071819	7/1/19	2019	8	\$9,557.64	\$9,557.64
191010150 FCDL Issued	1999013371	Funded	17014224	Western Arizona Vocational Education District	Consortium	AZ	143050150	Wirefree Communications Inc	16071819	7/1/19	2019	1	\$2,689.20	\$2,689.20
191010877 FCDL Issued	1999013417	Funded	17017628	Southwest Technical Education District of Yuma	Consortium	AZ	143001157	Wirefree Communications Inc	16071819	7/1/19	2019	1	\$26,503.20	\$26,503.20
191012321 FCDL Issued	1999013901	Funded	1608462	YAVAPAI COUNTY EDUCATIONAL TECHNOLOGY CONSORTIUM	Consortium	AZ	143002646	CITIZENS TELECOMM CO OF CA	16071819	7/1/19	2019	8	\$98,010.00	\$98,010.00
191024217 FCDL Issued	1999016070	Funded	1608462	YAVAPAI COUNTY EDUCATIONAL TECHNOLOGY CONSORTIUM	Consortium	AZ	143016933	Cable One, Inc.	16071819	7/1/19	2019	8	\$606,530.40	\$606,530.40
191014100 FCDL Issued	1999018652	Funded	17014124	GLIA INSTITUTE FOR TECHNOLOGY	Consortium	AZ	143045576	GovNet Communication Service	16071819	7/1/19	2019	3	\$10,626.00	\$10,626.00
191014636 FCDL Issued	1999019520	Funded	17015618	Pinai County School Office Education Service Agency	Consortium	AZ	143023855	Zayo Group, LLC	16071819	7/1/19	2019	8	\$377,400.00	\$377,400.00
191015672 Returned for Addition	1999021260	Pending	16082042	PIMA COUNTY JTED	Consortium	AZ	143014467	Cox Arizona Telecom, LLC	16071819	7/1/19	2019	8	\$78,477.84	\$78,477.84
191016876 15 Day Expired	1999021685	Pending	17017553	Cochise County Educational Technology Consortium	Consortium	AZ	143023855	Zayo Group, LLC	16071819	7/1/19	2019	8	\$15,110.24	\$15,110.24
191016876 15 Day Expired	1999026991	Pending	17017553	Cochise County Educational Technology Consortium	Consortium	AZ	143023855	Zayo Group, LLC	16071819	7/1/19	2019	8	\$26,872,663.50	\$26,872,663.50
191017722 FCDL Issued	1999025408	Funded	17017371	Santa Cruz County School Superintendents Office	Consortium	AZ	143001157	CenturyLink Qwest Communica	16071819	7/1/19	2019	7	\$174,930.00	\$174,930.00
191017884 FCDL Issued	1999025794	Funded	16076022	COLORADO RIVER EDUCATION TECHNOLOGY CONSORTIUM	Consortium	AZ	143035552	Mercury Voice and Data, LLC	16071819	7/1/19	2019	2	\$53,478.60	\$53,478.60
191017884 FCDL Issued	1999025814	Funded	16076022	COLORADO RIVER EDUCATION TECHNOLOGY CONSORTIUM	Consortium	AZ	143035552	Mercury Voice and Data, LLC	16071819	7/1/19	2019	2	\$29,743.20	\$29,743.20
191017884 FCDL Issued	1999025834	Funded	16076022	COLORADO RIVER EDUCATION TECHNOLOGY CONSORTIUM	Consortium	AZ	143035552	Mercury Voice and Data, LLC	16071819	7/1/19	2019	2	\$26,254.80	\$26,254.80
191016084 QA Review	1999027063	Pending	17019467	Gila County Information Education Technology Consortium	Consortium	AZ	143016933	Cable One, Inc.	16057463	7/1/19	2019	2	\$17,564,115.61	\$17,564,115.61
191019626 FCDL Issued	1999027127	Pending	17019467	Gila County Information Education Technology Consortium	Consortium	AZ	143016933	Cable One, Inc.	16057463	7/1/19	2019	2	\$485,645.44	\$485,645.44
191003775 FCDL Issued	1999027446	Funded	17014124	GLIA INSTITUTE FOR TECHNOLOGY	Consortium	AZ	143012572	SHI International Corpo.	16071819	7/1/19	2019	1	\$1,622.25	\$1,622.25
191003775 FCDL Issued	1999038884	Funded	143937	PINAL COUNTY LIBRARY DISTRICT	Consortium	AZ	143005231	CenturyLink Qwest Corporation	16071819	7/1/19	2019	10	\$41,844.58	\$41,844.58
191003775 FCDL Issued	1999034289	Funded	143937	PINAL COUNTY LIBRARY DISTRICT	Consortium	AZ	143001157	CenturyLink Qwest Communica	16071819	7/1/19	2019	10	\$4,158.23	\$4,158.23
191003775 FCDL Issued	1999034309	Funded	143937	PINAL COUNTY LIBRARY DISTRICT	Consortium	AZ	143001157	CenturyLink Qwest Communica	16071819	7/1/19	2019	10	\$12,808.65	\$12,808.65
191020264 FCDL Issued	1999035495	Funded	16074858	Paragonia School District Consortium	Consortium	AZ	143030223	Zones Corporate Solutions, Inc.	16049151	7/1/19	2019	4	\$3,186.70	\$3,186.70
191020264 FCDL Issued	1999035517	Funded	16074858	Paragonia School District Consortium	Consortium	AZ	143030223	Zones Corporate Solutions, Inc.	16049151	7/1/19	2019	4	\$1,314.86	\$1,314.86

# Valley Telephone Cooperative, Inc

Comparison of Costs of Schools Joining CCETC Versus Current Service

Exhibit 8

Entity	BEN /EN	Number of Students	Current Technology	Current Provider	Current Provider			Proposed Provider Through Consortium				
					Current Speed (1)	Current MRC	Ten Year Cost	Proposed Speed (2)	Proposed MRC	Ten Year Recurring	Construction Cost	Total Ten Year Cost
Bowie USD	143069	52	Fiber	Valley	250	\$ 189.95	\$ 22,794	10,000	\$ 395.00	\$ 47,400	\$ 1,374,669	\$ 1,422,069
San Simon USD	143100	116	Fiber	Valley	50	\$ 89.95	\$ 10,794	10,000	\$ 395.00	\$ 47,400	\$ 1,605,453	\$ 1,652,853
Elfrida Elementary School *	143075	128	Fiber	Valley	250	\$ 189.95	\$ 22,794	10,000	\$ 395.00	\$ 47,400	\$ 1,605,454	\$ 1,652,854
Willcox USD	143110	1,111	Fiber	Valley	200 Dedicated	\$ 2,000.00	\$ 240,000	10,000	\$ 395.00	\$ 47,400	\$ 1,043,544	\$ 1,090,944
Cochise Library District												
Elfrida Branch	229228	-	Fiber	Valley	100	\$ 139.95	\$ 16,794	10,000	\$ 395.00	\$ 47,400	\$ 718,154	\$ 765,554
Jimmy Libhart Branch	98082	-	Fiber	Valley	100	\$ 139.95	\$ 16,794	10,000	\$ 395.00	\$ 47,400	\$ 1,377,536	\$ 1,424,936
Portai Branch	98152	-	Fiber	Valley	100	\$ 139.95	\$ 16,794	10,000	\$ 395.00	\$ 47,400	\$ 1,519,447	\$ 1,566,847
Sunizona Branch	98137	-	Fiber	Valley	100	\$ 139.95	\$ 16,794	10,000	\$ 395.00	\$ 47,400	\$ 958,971	\$ 1,006,371
Sunsites Branch	98138	-	Fiber	Valley	100	\$ 139.95	\$ 16,794	10,000	\$ 395.00	\$ 47,400	\$ 1,016,309	\$ 1,063,709
<b>Totals</b>		<b>1,407</b>	<b>5,482</b>			<b>\$ 3,169.60</b>	<b>\$ 380,352</b>			<b>\$ 426,600</b>	<b>\$ 11,219,537</b>	<b>\$ 11,646,137</b>

Additional Cost of Service Through Consortium Versus Current

\$ 11,265,785

\*Elfrida Elementary School operates under the same BEN/EN as Valley Union High School. They were not listed separately in the Consortium but are included here for comparison purposes because Valley bills them separately from Valley Union.